

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

<p>GILDA HAGAN-BROWN,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ELI LILLY AND COMPANY, an Indiana corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:14-cv-01614-AJT-JFA</p> <p>Hon. Anthony J. Trenga Hon. John F. Anderson</p>
<p>JANINE ALI,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ELI LILLY AND COMPANY, an Indiana corporation,</p> <p style="text-align: center;">Defendant.</p>	<p>Case No. 1:14cv-01615-AJT-JFA</p> <p>Hon. Anthony J. Trenga Hon. John F. Anderson</p>

FED. R. CIV. P. 26(a)(3) DISCLOSURES

Plaintiffs Gilda Hagan-Brown and Janine Ali (“Plaintiffs”) submit, pursuant to Fed. R. Civ. P. 26(a)(3) and this Court’s January 5, 2015 Order, the following disclosures.

I. Rule 26(a)(3)(A)(i) Disclosures: Witnesses

A. Common Witnesses

Name	Description	Contact Information
Joseph Glenmullen, M.D.	Plaintiffs’ Expert Witness	Previously disclosed
Louis A. Morris, Ph.D.	Plaintiffs’ Expert Witness	Previously disclosed

Name	Description	Contact Information
Sharon L. Hoog, M.D.	Eli Lilly Employee	Defendant's custody
Sara A. Mescher	Eli Lilly Employee	Defendant's custody
David G. Perahia, M.D.	Eli Lilly Employee	Defendant's custody
Matthew Kuntz	Former Eli Lilly Employee	Defendant's custody
Michael J. Detke, M.D.	Former Eli Lilly Employee	Defendant's custody
Madeleine M. Wohlreich, M.D.	Eli Lilly Employee / Rule 30(b)(6) Representative	Defendant's custody
Christine Phillips, Ph.D.	Eli Lilly Employee / Rule 30(b)(6) Representative	Defendant's custody

B. Plaintiff Hagan-Brown Case-Specific Witnesses

Name	Description	Contact Information
Gilda Hagan-Brown	Plaintiff	Previously disclosed
Henry Hagan-Brown	Plaintiff's Husband	Previously disclosed
Natalie Presley	Plaintiff's Daughter	Previously disclosed
Mohammad Bahadori, M.D.	Plaintiff's Doctor	Previously disclosed
Ronald J. Koshes, M.D.	Plaintiff's Doctor	Previously disclosed
Carol S. McCleary, PSY.D.	Plaintiff's Psychologist	Previously disclosed

C. Plaintiff Ali's Case-Specific Witnesses

Name	Description	Contact Information
Janine Ali	Plaintiff	Previously disclosed
Jehad Ali, Esq.	Plaintiff's Son	Previously disclosed
Dalal Ali	Plaintiff's Daughter	Previously disclosed
Navera R. Ahmed, M.D.	Plaintiff's Doctor	Previously disclosed
Ismahan I. Ugas	Plaintiff's Friend	Previously disclosed
Thonia Hafez Gab-Allah, M.D.	Plaintiff's Doctor	Previously disclosed
Jayasree Patla, M.D.	Plaintiff's Friend	Previously disclosed

II. Rule 26(a)(3)(A)(ii) Disclosures: Deposition Designations**A. Sharon L. Hoog, M.D., Video-Taped Deposition Taken December 10, 2014**

14:17-14:23	43:9-44:8	88:22-89:12	165: 19-166:21
15:14-16:22	45:14-57:2	90:7-91:3	168:20-170:6
17:3-17:6	58:17-59:18	94:21-103:17	170:20-171 :8
17:15-18:8	59:24-63:23	108:5-111:1	171:15-171:23
19:14-20:16	64:5-64:11	129:5-130:21	172:1-177:5
20:21-22:1	69:12-70:25	131:19-132:7	177:13-185:7
22:25-25: 19	73:6-75:15	133:5-133:8	197:10-198:6
26:1-27:9	81:24-83:9	133:24-134:8	198:14-198:17
30:6-30:15	84:22-85:3	152:1-154:13	199: 1 0-200:24
33:16-35:5	85:18-85:24	157:8-159:10	306:16-306:19
41:5-41:15	86:14-87:4	160:9-162:25	165: 19-166:21

B. Sara A. Mescher, Video-Taped Deposition Taken December 9, 2014

12:6-12:15	30:3-30:16	44:7-44:11	70:24-71:1
12:22-13:15	31:4-32:9	47:6-47:22	71:8-71:12
15:7-18:6	32:25-33:2	48:7-50:2	72:1-72:15
19:7-19:14	37:11-39:12	50:11-51:23	73:2-73:11

20:20-21:16	40:16-41:7	53:22-54:5	75:10-78:25
23:19-26:18	41:18-42:16	59:10-64:11	109:3-109:25
27:15-28:2	43:13-43:14	66:3-69:16	

C. David G. Perahia, M.D., Video-Taped Deposition Taken December 12, 2014

17:17-19:11	84:12-87:10	151 :7-151:14	194:19-194:23
20:2-20:9	88:22-92:3	151 :22-153:1	195:4-196:5
21:16-22:25	101 :10-102:17	155:20-156:4	196:13-197:2
25:20-25:24	103:3-104:1	159:3-159:12	199: 14-200: 1 0
26:18-27:7	110:23-111:23	160:23-161:3	201 :5-212:8
33:17-38:2	112:8-115:11	167:2-167:22	217:13-226:3
44:9-46:17	115:20-115:20	172:8-173 :22	227:21-229:6
52:16-53:15	116:8-117:7	174:17-175:21	239: 1-239: 15
62:9-62:23	117:12-119:20	176:5-176:25	240:9-247:7
63:19-64:4	143:13-143:21	177:20-178:14	251:8-254:22
64:12-65:6	145:23-148:2	181:10-182:3	302:2-302:16
79:17-84:3	148:9-150:23	192:7-193:5	

D. Matthew Kuntz, Video-Taped Deposition Taken May 6, 2015

6:13-6:20	41:13-43:25	74:4-75:23	105:8-111:25
9:18-10:5	56:4-56:11	76:2-77:17	112:6-112:22
11:4-13:23	58:25-62:6	82:12-85:4	116:1-117:23
19:10-20:2	63:3-64:22	86:18-89:12	196:7-202:5
24:11-25:18	65:5-66:8	89:18-89:22	202:10-204:13
26:4-28:12	66:13-68:7	90:22-91:25	204:25-205:10
28:25-29:16	68:14-68:24	92:17-102:22	
29:19-30:20	69:14-69:19	103:1-103:11	
30:25-31:25	70:6-71:9	103:23-105:5	

E. Michael J. Detke, M.D., Video-Taped Deposition Taken April 28, 2015

6:14-6:20	49:17-50:23	104:5-104:15	170:17-170:23
7:23-10:13	51:19-53:16	107:23-108:18	171:12-174:19
12:2-12:18	58:15-59:14	115:8-121:2	181:8-183:13
18:4-18:16	65:2-68:3	121:12-121:16	186:15-191:9
19:6-19:25	70:16-71:5	123:4-124:16	192:13-192-14
20:25-22:23	78:3-80:6	127:13-128:23	192:23-194:11
28:2-29:1	80:24-81:7	129:5-132:8	195:11-201:10
29:10-30:21	83:13-85:16	132:24-135:6	222:21-224:19
33:22-35:9	86:18-88:5	139:20-104:2	225:2-225:7
36:21-41:23	90:2-91:8	143:7-145:6	232:4-235:18
43:4-44:2	94:1-96:22	145:15-158:12	236:7-237:6
46:14-48:24	99:18-101:18	166:9-168:6	281:11-284:18

F. Madeleine M. Wohlreich, M.D., Video-Taped Deposition Taken April 29, 2015

6:19-6:22	72:14-72:18	166:23-168:10	265:8-266:18
10:21-12:22	73:9-73:17	168:20-168:25	267:3-268:7
13:12-13:20	92:4-92:14	185:1-186:4	269:16-269:25
15:16-20:14	94:24-98:14	206:14-207:9	285:3-286:22
21:8-24:13	99:21-102:11	210:3-210:20	289:11-292:18
40:10-41:2	102:18-120:4	215:10-222:2	293:3-295:9
42:23-44:22	120:16-124:19	232:16-233:1	295:18-298:20
46:1-46:19	125:3-134:4	236:1-237:8	299:9-306:20
47:3-48:14	134:21-135:7	240:12-241:16	340:7-342:9
49:9-49:19	136:11-136:17	243:5-245:7	343:13-350:17
56:5-56:19	138:14-139:20	246:11-247:18	368:5-374:19
57:11-58:9	140:4-142:1	249:16-250:20	376:8-381:6
59:15-60:5	142:4-144:15	251:10-254:24	381:23-383:18
60:10-61:6	145:13-146:13	256:7-256:19	397:5-400:4
63:3-63:15	147:17-148:3	257:12-258:18	425:6-425:21
65:10-66:2	163:17-166:16	259:14-263:13	426:13-434:12

G. Rule 30(b)(6) Deposition of Madeleine M. Wohlreich, M.D., Video-Taped Deposition Taken April 30, 2015

6:16-11:4	124:1-125:22	137:6-137:12	137:6-137:12
17:6-17:17	126:14-127:20	138:4-139:25	138:4-139:25
20:22-21:19	128:5-128:11	141:5-143:24	141:5-143:24
24:14-25:5	128:18-129:11	144:6-145:14	
25:22-27:20	129:21-130:7	147:25-149:20	
31:4-32:14	130:22-136:15	150:14-151:8	

H. Rule 30(b)(6) Deposition of Christine Phillips, Ph.D., Video-Taped Deposition Taken April 30, 2015

7:9-8:18
 13:5-13:13
 166:5-167:19
 195:6-199:12
 201:2-201:19
 202:7-205:2

III. Rule 26(a)(3)(A)(iii) Disclosures: Exhibit List**A. Plaintiffs' Common Exhibits, Starting at Exhibit No. 1**

No.	Description	Identifier
1	2006 Needs / Gaps Assessment - Prioritization and Solutions, 1/16/2006	CYM-02998761
2	Addendum to Expert Report of Dr. Joseph Glenmullen (general), 5/11/2015	Discovery responses
3	Advertisement transcript (undated)	CYM-00009871; Clark Depo. Exh. 9
4	Allgulandar, "Pharmacotherapy of generalized anxiety disorder: results of duloxetine treatment from a pooled analysis of three clinical trials," Current Medical Research and Opinions, Vol. 23, No. 6, 2007, 1245-1252	Public Document
5	AMDP-5 Checklist	CYM-01932483-*2486
6	Annex 1, Summary of Product Characteristics, last renewal date of 6/24/2009	Bahadori Depo. Exh. 4
7	Baldwin et al, <i>Discontinuation Symptoms in Depression and Anxiety Disorders</i> , Int. J. Neuropsychopharmacology, 1-13 (2005)	Public Document; Hoog Depo. Exh. 8
8	Blier, "Physiologic Mechanisms Underlying the Antidepressant Discontinuation Syndrome," J Clin Psych 2006; 67 (suppl 4)	Public Document
9	Boulenger, "Efficacy and safety of vortioxetine (Lu AA21004), 15 and 20 mg/day: a randomized double-blind, placebo controlled, duloxetine-referenced study in the acute treatment of adult patients with major depressive disorder," Intl Clin Psychopharm, 2014, Vol 29 No. 3	Public Document

No.	Description	Identifier
10	CHANGES BEING EFFECTED: Letter from Bryan Boggs to FDA Re. NDA 21-4127, CYMBALTA (duloxetine HCL) Changes Being Effectuated Labeling Supplement, 10/25/2007	CYM-01113163; CYM-01113163; Phillips Depo. Exh. 6
11	Clinical Report Form, Fluoxetine Versus Sertraline and Paroxetine in Major Depression: Comparison for Discontinuation-Emergent Symptoms, Discontinuation Emergent Signs and Symptoms	FAVA-004, FAVA-003 (pages in reverse order); Hoog Depo. Exh. 7 (excerpts)
12	Cumulative Review of Spontaneous Reports of Agression or Hostility, Draft May 2007	CYM-02993513
13	Curriculum Vitae, Dr. David Perahia, 11/2014	Perahia Depo. Exh. 2
14	Curriculum Vitae, Michael R. Clark, 5/17/2015	Clark Depo. Exh. 5
15	Cymbalta (duloxetine HCI) for Major Depressive Disorder Frequently Asked Questions, approved 9/16/2004	CYM-018663411; Detke Depo. Exh. 24
16	Cymbalta 2010 Lilly USA, LLC Brand Council III, 9/2/2009	CYM-01725351
17	Cymbalta Customer Plan, 2012-2013	CYM-01725585
18	Cymbalta Data Impact Test with PCP's, 1/5/2006	CYM-02784272
19	Cymbalta Discrete Choice Model Summary, 7/2002	CYM-02783967
20	Cymbalta Labeling Changes Chronology, Precision for Medicine	Becker Depo. (12/3/14) Exh. 5
21	Cymbalta Medication Guide Changes Timeline, Precision for Medicine	Becker Depo. (12/3/14) Exh. 6
22	Cymbalta U.S. Product Insert, revised 09/2011	CYM-00028678
23	Cymbalta U.S. Product Insert, undated (Detke Depo.)	Detke Depo. Exh. 6

No.	Description	Identifier
24	Cymbalta U.S. Product Insert, undated (Kuntz Depo.)	Kuntz Depo. Exh. 1
25	Cymbalta US, BC III, 9/16/2008	CYM-01725885
26	Declaration of Sarah L. Helgeson, <i>Saavedra v. Eli Lilly and Co.</i> , 12-CV-9366-SVW-MAN (C.D. Cal.), Dkt. 55, with included exhibits	Wohlreich Depo. Exh. 1
27	Determination Leads to Discovery, Eli Lilly and Company, 2013 Annual Report, Notice of 2014 Annual Meeting, Proxt Statement	Hoog Depo. Exh. 4
28	Dilsaver, "Withdrawal phenomena associated with antidepressant and antipsychotic agents," Drug Safety 10(2): 103-114	Public Document
29	Division of medication Errors and technical Support Office of Surveillance and Epidemiology, FDA, Memorandum Re. DMETS MEDICATION ERROR POSTMARKETING SAFETY REVIEW, 3/8/2007	CYM-02053036; Kuntz Depo. Exh. 14
30	Duloxetine CELE© for Depression U.S. Launch: Psych's and PCP's, 5/3/02	CYM-02783656
31	Duloxetine/Cymbalta Discrete Choice Study, 7/8/2002	CYM-02783884
32	Eli Lilly & Co., Cymbalta, U.S. Strategic Pricing Study, 8/2/2002	CYM-02786215
33	Eli Lilly & Co., Patient Segmentation Study, 8/4/2004	CYM-02784163
34	Email exchange Re. EU 20 mg - clinical rationale, with attachment, 8/12/2008	CYM-02997573
35	Email exchange Re. 20 mg rationale, 6/25/2008	CYM-01873412

No.	Description	Identifier
36	Email exchange Re. abrupt vs taper discontinuation in duloxetine-treated patients (updated analysis), with attachment 8/28/2008	CYM-01780840; CYM-01780842
37	Email exchange Re. Agenda for today All Regulatory / Regulatory Working Group, with attachment, 8/26/2003	CYM-02995196
38	Email exchange Re. An obscure question (redacted), 6/30/2003 - 7/2/2003	CYM-01873414; Detke Depo. Exh. 14
39	Email exchange Re. An obscure question (unredacted), 6/30/2003 - 7/2/2003	CYM-R-01873414; Wohlreich Depo. Exh. 2
40	Email exchange Re. Checking your availability for August	CYM-02791746; <i>see</i> Detke Depo. Exh. 10 (incomplete, wrong scanning)
41	Email exchange Re. comments on SUI clinical expert report, 11/11/2002	CYM-01813088; Detke Depo. Exh. 13
42	Email exchange Re. Confidential Advance Copy of QuarterWatch, 10/2/2012 - 10/4/2012	CYM-01779243; Perahia Depo. Exh. 19
43	Email exchange Re. CYMBALTA PM Revisions, 9/30/2011 - 10/4/2011	CYM-01873565; Kuntz Depo. Exh. 8
44	Email exchange Re. Cymbalta Safety Review - Re. Postmarketing Safety Evaluation of New Molecular Entities: Final Report, 10/15/2009	CYM-02053002; Kuntz Depo. Exh. 13
45	Email exchange Re. CYMBALTA: Slides and Study Citation for 30 mg "down-titration" dose, 4/13/2007	CYM-01815980; Wohlreich Depo. Exh. 27
46	Email exchange Re. Discontinuation Symptoms Manuscript Comments, 12/7/2004 - 12/8/2004	CYM-01873441; Perahia Depo. Exh. 5
47	Email exchange Re. DLX019 Discontinuation Symptoms GRD (Ready for review/comments/approval), with attachment, 7/26/2007	CYM-01955577; CYM-01955577; Perahia Depo. Exhs. 15 & 16

No.	Description	Identifier
48	Email exchange Re. Duloxetine AE report, 2/16/2012	CYM-01780878; Perahia Depo. Exh. 17
49	Email exchange Re. Duloxetine regulatory response based on ped/elderly GAD submission, 8/26/2014	Mescher Depo. Exh. 6; CYM-01777306
50	Email exchange Re. Duloxetine safety review slides, 8/15/2007, with attachments	Wohlreich Depo. Exh. 11; CYM-02485292-*335
51	Email exchange Re. Duloxetine withdrawal syndrome - Signal, 8/29/2012	CYM-01776691; Perahia Depo. Exh. 18
52	Email exchange Re. Duloxetine/Cymbalta Withdrawal Syndrome, 10/14/2006 - 10/19/2006	CYM-01781110; Detke Depo. Exh. 20
53	Email exchange Re. FDA request. Fw. NDA 21427, 8/15/2011 -8/17/2011	CYM-02212693
54	Email exchange Re. Fw. Follow-up on PLR meeting - tapering (Detke Depo.), 9/14/2006 - 9/15/2006	CYM-02234967; Detke Depo. Exh. 31
55	Email exchange Re. Fw. Follow-up on PLR meeting - tapering (Wohlreich Depo.), 9/14/2006 - 9/17/2006	CYM-02363882; Wohlreich Depo. Exh. 10
56	Email exchange Re. HMBU : Taper period, with attachment, 10/17/2002	CYM-01781318; CYM-01781319
57	Email exchange Re. HMBU: Taper Period, 10/17/2001 - 10/18/2002	CYM-01802882; Detke Depo. Exh. 11
58	Email exchange Re. HMBU: Taper Period, 10/17/2001 - 10/23/2002	CYM-01780901; Perahia Depo. Exh. 4
59	Email exchange Re. Inner tension, a Cymbalta AE?, 10/2/2006	CYM-01816937
60	Email exchange Re. IUIRB, with attachments, 2/22/2004 - 2/23/2004	CYM-02993010

No.	Description	Identifier
61	Email exchange Re. Paroxetine Switch, with attachment slides, 6/16/2003 - 6/19/2003	CYM-01816776; CYM-01816776; Perahia Depo. Exhs. 8 & 9
62	Email exchange Re. Question about Treatment-Emergent adverse events (redacted), 10/17/2012 - 10/24/2012	CYM-02850728; Wohlreich Depo. Exh. 22
63	Email exchange Re. Resubmitted. Your Review Required Again for Disclosure Approval Request TMIS-6GWKTM Deadline - 10/11/2005 Type = Poster, 10/6/2005 - 10/11/2005	CYM-02738381; Detke Depo. Exh. 25
64	Email exchange Re. Speaking of discontinuation...., 10/17/2012	CYM-02850768; Wohlreich Depo. Exh. 20
65	Email exchange Re. Summary of Primary Care Speaker Workshop, 12/3/2005 - 12/5/2005	CYM-02309202; Wohlreich Depo. Exh. 15
66	Email exchange Re. URGENT: Stand-by statement on Cymbalta medical issues, with attachment, 4/23/2004	CYM-02993062
67	Email exchange Re. Withdrawal scale for Duloxetine, 5/5/2008	CYM-02806828; Detke Depo. Exh. 4
68	Excerpts of F1J-MC-HMBR Study Report, 3/2/2006	Rule 30(b)(6) Wohlreich Depo. Exh. 13
69	Excerpts of Protocol F1J-MC-HMBU(a), Duloxetine Versus Venlafaxine Extended Release in the Treatment of Major Depressive Disorder, 2/26/2003	Rule 30(b)(6) Wohlreich Depo. Exh. 6
70	Excerpts of Supportive Optional Document to the Duloxetine Core Data Sheet Pre-Read Based on Clinical Trial Data in the Adult Population, April 2010 through October 2011, 3/6/2012	Rule 30(b)(6) Wohlreich Depo. Exh. 15
71	Executive Summary, 2000	CYM-02785859

No.	Description	Identifier
72	Expert Report of Dr. Joseph Glenmullen (general), 9/22/2014	Discovery responses
73	Expert Report of Karen M. Becker, 5/14/2015	Discovery responses
74	Expert Report of Karen M. Becker, 9/22/2014	Discovery responses
75	Expert Report of Louis A. Morris, 9/18/2014	Discovery responses
76	Hyman, "Initiation and Adaptation: A Paradigm for Understanding Psychotropic Drug Action," Am J Psych 153:2, February 1996	Public Document
77	Institute for Safe Medication Practices, QuarterWatch, Mointoring FDA MedWatch Reports, 10/3/2012 (in color and without bates)	Kuntz Depo. Exh. 4; <i>see, e.g.</i> , CYM-01773186
78	Journal of Clinical Psychiatry, Volume 28, Supplement 7, 1997	Public Document; Detke Depo. Exh. 1
79	Letter from Ann Sakai to FDA Re. NDA 21-4127, CYMBALTA (LY248686, duloxetine hydrochloride) for Major Depressive Disorder, 5/17/2007	CYM-01111111; CYM-01111112; Phillips Depo. Exh. 5
80	Letter from Jennifer Holmes, Esq., Re. Discovery, 3/19/2015	Discovery responses
81	Letter from Robert Temple, FDA to G. Brophy, with attached U.S. Product Insert, 8/3/2004	Hoog Depo. Exh. 18; CYM-00727991-*8014
82	Letter to Dr. Mauizio Fava from Barney Krebs, 7/7/1997	FAVA-001; Hoog Depo. Exh. 7 (excerpt)
83	Lilly Reprint of Hudson et al, Safety and Tolerability of Duloxetine in the Treatment of Major Depressive Disorder: Analysis of Pooled Data from Eight Placebo-Controlled Clinical Trials, 20 Hum. Psychopharmacology Clin. Exp. 327-341 (2005)	CYM-00041925; Wohlreich Depo. Exh. 5
84	Lilly Website Printouts	Hoog Depo. Exh. 3

No.	Description	Identifier
85	Lilly's Role, Website Printout, 6-15-2015	Public document
86	Maund et al. "Benefits and harms in clinical trials of duloxetine for treatment of major depressive disorder: comparison of clinical study reports, trial registries, and publications," BMJ, 2014 Jun 4;348:g3510.	Public Document
87	Maurizio Fava, <i>Prospective Studies of Adverse Events Related to Antidepressant Discontinuation</i> , 67 J. Clin. Psychiatry 2007 (suppl. 4), 14-21 (2006)	Public Document; Detke Depo. Exh. 3
88	Medical Information Letter, Cymbalta - Discontinuation Symptoms, 2/11/2005	CYM-01727834; Detke Depo. Exh. 19
89	Memorandum to Maurizio Fava and Jerold Rosenbaum, Re. Analysis plans for Study HCHJ - Brief Interruption of SSRI Therapy, 2/11/1998	FAVA-022-FAVA-024; Hoag Depo. Exh. 7 (excerpt)
90	Memorandum to Sharon Blomgreen and Cris Nordhoff, Re. Acute-phase analysis plans for Study HCHJ, 6/27/1997	FAVA-002; Hoag Depo. Exh. 7 (excerpt)
91	Newman, "A Black-Box Warning for Antidepressants in Children?" NEJM, October 14, 2004, 1595-1598	Public Document
92	Original (2004) Label Text Re. Discontinuation	Phillips Depo. Exh. 3
93	Perahia, et al, <i>Symptoms following abrupt discontinuation of duloxetine treatment in patients with major depressive disorder</i> , 89 J. of Affective Disorders, 207-212 (2005)	Public Document
94	Press Release, Re. FDA Approves Cymbalta for the Management of Chronic Musculoskeletal Pain, 11/4/2010	CYM-01720634; Clark Depo. Exh. 8
95	Prozac Pyramid Positioning/Message Development Research, 6/2000	CYM-02989901

No.	Description	Identifier
96	Rebuttal Expert Report of Karen M. Becker, 5/21/2015	Discovery responses
97	Resume, Christine A. Phillips, 5/2014	Phillips Depo. Exh. 2
98	Resume, Sara A. Mescher	Mescher Depo. Exh. 2
99	Resume, Sharon L. Hoog, M.D., 11/26/2014	Hoog Depo. Exh. 2
100	Richelson, "Pharmacology of Antidepressants," Mayo Clin Proc. 2001;76:511-527	Public Document
101	Risk Management Plan (Revision 3), 8/8/2007	Hoog Depo. Exh. 10; CYM-01137786-*8007
102	Risk Management Plan (rv2) exerpts, 10/12/2006	Hoog Depo. Exh. 9; CYM-01671010-*1020
103	Rodger Grimson, PhD, A Statistical Analysis of Data Regarding Abrupt Discontinuation of Duloxetine in Patients with Major Depressive Disorder, 9/19/2014	Discovery responses
104	Spielmans, "A Case Study of Salami Slicing: Pooled Analyses of Duloxetine for Depression," Psychotherapy and Psychosomatics, 2010; 79:97-106	Public Document
105	Spielmans, "Duloxetine Does Not Relieve Painful Symptoms in Depression: A Meta-Analysis," Psychotherapy and Psychosomatics, 2008;77:12-16	Public Document
106	Summary of Product Characteristics, 2010, updated 11/8/2010	CYM-01800276; Mescher Depo. Exh. 5
107	Supplemental Expert Report of Louis A. Morris, 5/2015	Discovery responses
108	Table: Treatment-Emergent Adverse Events By Decreasing Frequency All Patients who Entered Study Period IV - Excluding VEN75MG Group F1-MC-HMBU & HMCQ Study Period IV	CYM-00149625-*9204; Rule 30(b)(6) Wohleisch Depo. Exh. 12

No.	Description	Identifier
109	Table: Treatment-Emergent Adverse Events By Decreasing Frequency All Patients who Entered Study Period IV F1-MC-HMBU	CYM-00144852-*4855; Rule 30(b)(6) Wohlreich Depo. Exh. 9
110	Table: Treatment-Emergent Adverse Events By Decreasing Frequency All Patients who Entered Study Period IV F1-MC-HMBU & HMCQ Study Period IV	CYM-00149596-*9602; Rule 30(b)(6) Wohlreich Depo. Exh. 11
111	Table: Treatment-Emergent Adverse Events Collected by AMDP-5 By Decreasing Frequency All Patients who Entered Study Period IV F1-MC-HMBU Study Period IV	CYM-00145306-*5307; Rule 30(b)(6) Wohlreich Depo. Exh. 8
112	Table: Treatment-Emergent Adverse Events Collected by AMDP-5 By Decreasing Frequency All Patients who Entered Study Period IV F1-MC-HMCQ Study Period IV	CYM-00149293-*9294; Rule 30(b)(6) Wohlreich Depo. Exh. 10
113	The Analgesic Efficacy of Cymbalta (duloxetine HCI) in Fibromyalgia and Diabetic Peripheral Neuropathic Pain (undated)	CYM-01188735; Clark Depo. Exh. 7
114	The Market and Competition for Cymbalta, 3/2003	CYM-01866789
115	Turner, "Selective Publication of Antidepressant Trials and its Influence on Apparent Efficacy," NEJM, January 16, 2008, 358;3, 252-260	Public Document
116	U.S. Product Insert, revised 8/24/2012	CYM-00509373; Mescher Depo. Exh. 3
117	Website printout (undated)	CYM-01188150; Clark Depo. Exh. 11
118	Joseph Glenmullen, Antidepressant Solution, A Step-by-Step Guide to Safely Overcoming Antidepressant Withdrawal, Dependence, and "Addiction"	Public Document

No.	Description	Identifier
119	Rosenbaum, Fava, Hoog, Ascroft, Krebs, "Selective serotonin reuptake inhibitor discontinuation syndrome: a randomized clinical trial," Biological Psychiatry, 1998; 44(2):77-87	Public Document
120	Thailand Cymbalta Label	Lilly produced, no bates #s
121	Malaysia Cymbalta Label	Lilly produced, no bates #s
122	Saudi Arabia Cymbalta Label	Lilly produced, no bates #s
123	Egypt Cymbalta Label	Lilly produced, no bates #s
124	Israel Cymbalta Label	Lilly produced, no bates #s
125	Chile Cymbalta Label	Lilly produced, no bates #s
126	Argentina Cymbalta Label	Lilly produced, no bates #s
127	Pakistan Cymbalta Label	Lilly produced, no bates #s
128	China Cymbalta Label	Lilly produced, no bates #s
129	Latin America Cymbalta Label	Lilly produced, no bates #s
130	Deposition transcript of Christine Phillips	Discovery document
131	Deposition transcript of David Perahia, M.D.	Discovery
132	Deposition transcript of Elyah Musleh	Discovery
133	Deposition transcript of Karen Becker, May 28, 2015	Discovery
134	Deposition transcript of Karen Becker, December 3, 2014	Discovery
135	Deposition transcript of Madeleine Wohlreich, M.D., April 29, 2015	Discovery
136	Deposition transcript of Madeleine Wohlreich, M.D., April 30, 2015	Discovery

No.	Description	Identifier
137	Deposition transcript of Matt Kuntz	Discovery
138	Deposition transcript of Michael Clark, M.D.	Discovery
139	Deposition transcript of Michael Detke, M.D.	Discovery
140	Deposition transcript of Sara Mescher	Discovery
141	Deposition transcript of Sharon Hoog, M.D.	Discovery
142	Deposition transcript of Steven P. Knowles	Discovery
143	Deposition transcript of Torkil Fredborg	Discovery
144	Deposition transcript of Joseph Glenmullen, M.D., June 1, 2015	Discovery
145	Deposition transcript of Joseph Glenmullen, M.D., November 25, 2014	Discovery
146	Deposition transcript of Louis Morris, May 26, 2015	Discovery
147	Deposition transcript of Louis Morris in <i>Herrera</i> and <i>Hexum</i>	Discovery

B. Plaintiff Hagan-Brown's Case-Specific Exhibits, Starting at Exhibit No. 201

No.	Description	Identifier
201	Defendant's Responses to Hagan-Brown's Amended First Set of Requests for Admission, served March 9, 2015	Discovery responses
202	Defendant's Responses to Hagan-Brown's First Set of Interrogatories, served March 9, 2015	Discovery responses
203	Rebuttal Expert Report of Dr. Michael Clark (Hagan-Brown v. Eli Lilly), 5/21/2015	Discovery responses

No.	Description	Identifier
204	Expert Report of Dr. Joseph Glenmullen (Hagan-Brown v. Eli Lilly), 5/14/2015	Discovery responses
205	Plaintiff Hagan-Brown's Complaint	Litigation document.
206	Deposition transcript of Gilda Hagan-Brown	Discovery
207	Expert Report of Dr. Michael Clark (Hagan-Brown v. Eli Lilly), 5/14/2015	Discovery responses
208	Medical record from Dr. Scott Whittaker dated November 22, 2011	Gilda Hagan-Brown deposition, Exhibit 6, page 70
209	Social Security Disability paperwork marked as Exhibit 7 at Gilda Hagan-Brown's deposition	Gilda Hagan-Brown deposition, Exhibit 7, page 1 - 17
210	Sleep Study report from Dr. Rashid Nayyar, August 3, 2012 – August 4, 2012	Discovery responses
211	Index card created by Gilda Hagan-Brown listing her fibromyalgia symptoms (produced at deposition)	Discovery responses
212	Progress Notes from Dr. Bahadori dated September 17, 2012	BROWNG_BAHADORIM_0002, BROWNG_BAHADORIM_0003, and BROWNG_BAHADORIM_0011
213	Progress Notes from Dr. Bahadori dated September 24, 2012	BROWNG_BAHADORIM_0010
214	Progress Notes from Dr. Bahadori dated December 13, 2012	BROWNG_BAHADORIM_0009
215	CVS Pharmacy records showing Cymbalta prescriptions	BROWNG_BAHADORIM_0012
216	Records marked as Exhibit 1 to Gilda Hagan Brown's deposition	Gilda Hagan-Brown deposition, Exhibit 1, page 1-16
217	Progress Notes from Dr. Bahadori dated February 5, 2013	BROWNG_BAHADORIM_0008

No.	Description	Identifier
218	Progress Notes from Dr. Bahadori dated March 25, 2013	BROWNG_BAHADORIM_0007
219	Index Card created by Gilda Hagan-Brown listing Cymbalta withdrawal side effects	Gilda Hagan-Brown deposition, Exhibit 1, page 13
220	Progress Notes from Dr. Bahadori dated March 13, 2013	BROWNG_BAHADORIM_0006
221	Progress Notes from Dr. Bahadori dated May 14, 2013	BROWNG_BAHADORIM_0004
222	Records from Prince William Family Counseling marked as Exhibit 4 to Gilda Hagan Brown's deposition	Gilda Hagan-Brown deposition, Exhibit 4, page 1-28
223	Psychological Assessment by Carol McCleary of Prince William Family Counseling on April 11, 2013 and July 2, 2013	BROWNG_PLTF_0018 - BROWNG_PLTF_0025
224	Medical records from Youth for Tomorrow marked as Exhibit 3 to Gilda Hagan Brown's deposition	BROWNG_KOSHESR_0001 - BROWNG_KOSHESR_0006
225	Doctor Visit Form from Dr. Koshes of Youth for Tomorrow dated May 7, 2014	BROWNG_KOSHESR_0006
226	Nurse's Notes from Youth for Tomorrow dated May 7, 2014	BROWNG_KOSHESR_0002
227	Plaintiff's Responses to Defendant's First Set of Interrogatories and Verification served February 11, 2015	Discovery responses
228	Deposition transcript of Mohammad Bahadori, M.D.	Discovery
229	Deposition transcript of Henry Hagan-Brown	Discovery
229	Deposition transcript of Ronald Koshes, M.D.	Discovery
229	Deposition transcript of Carol McCleary	Discovery

No.	Description	Identifier
230	Brief Chronology regarding Gilda Hagan-Brown created by Dr. Glenmullen	Discovery responses
231	List of withdrawal side-effects experienced by Gilda Hagan-Brown used by Dr. Glenmullen	Discovery responses

C. Plaintiff Ali's Case-Specific Exhibits, Starting at Exhibit No. 301

No.	Description	Identifier
301	Expert Report of Dr. Michael Clark (Ali v. Eli Lilly), 5/14/2015	Discovery responses
302	Rebuttal Expert Report of Dr. Michael Clark (Ali v. Eli Lilly), 5/21/2015	Discovery responses
303	Expert Report of Dr. Joseph Glenmullen (Ali v. Eli Lilly), 5/14/2015	Discovery responses
304	Defendant's Responses to Ali's Amended First Set of Requests for Admission, served March 9, 2015	Discovery responses
305	Defendant's Responses to Ali's First Set of Interrogatories, served March 9, 2015	Discovery responses
306	Plaintiff Ali's Complaint	Litigation document.
307	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0008
308	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0009 – ALIJ_AHMEDN_0010
309	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0015
310	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0016
311	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0026 – ALIJ_AHMEDN_0027
312	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0034

No.	Description	Identifier
313	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0053
314	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0056
315	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0073
316	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0074
317	Dr. Navera Ahmed records regarding Janine Ali	ALIJ_AHMEDN_0082 – ALIJ_AHMEDN_0083
318	Alexandria Healthcare Center records regarding Janine Ali	Ali, Janine 1 Alexandria HCC
319	CVS/Caremark records regarding Janine Ali	ALIJ_CP_0001 – ALIJ_CP_0005
320	Plaintiff's Responses to Defendant's First Set of Interrogatories	Discovery responses
321	Plaintiff's Amended Responses to Defendant's First Set of Interrogatories	Discovery responses
322	Plaintiff's Responses to Defendant's Second Set of Interrogatories	Discovery responses
323	Deposition transcript of Jihad Ali	Discovery
324	Brief Chronology regarding Janine Ali created by Dr. Glenmullen	Discovery responses
325	List of withdrawal side-effects experienced by Janine Ali used by Dr. Glenmullen	Discovery responses

DATED: June 17, 2015

Respectfully submitted,

/s/ Peter A. Miller

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of June, 2015, a true copy of the foregoing FED. R. CIV. P. 26(a)(3) DISCLOSURES was filed electronically with the Clerk of Court for the Eastern District of Virginia, using the CM/ECF system, which will send a notification of such filing to the following:

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